

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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	:	
In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Re: Docket No. 27 & 53
	:	
	X	

**CERTIFICATION OF COUNSEL REGARDING REVISED FINAL ORDER
(A) AUTHORIZING PAYMENT OF CERTAIN PREPETITION WORKFORCE
OBLIGATIONS, (B) AUTHORIZING CONTINUANCE OF WORKFORCE
PROGRAMS, (C) AUTHORIZING PAYMENT OF WITHHOLDING AND
PAYROLL-RELATED TAXES, (D) AUTHORIZING PAYMENT OF PREPETITION
CLAIMS OWING TO ADMINISTRATORS, AND (E) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On June 25, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owing to Administrators, and (E) Granting Related Relief* [Docket No. 27] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Motion as **Exhibit B** was a proposed form of order granting the relief requested in the Motion on a final basis (the “**Proposed Final Order**”).

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

2. On June 27, 2025, the Court entered the *Interim Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, And Granting Related Relief* [Docket No. 53] (the “**Interim Order**”).

3. Pursuant to the Interim Order and the *Notice of (I) Entry of Interim Order (A) Authorizing Payment of Certain Prepetition Workforce Obligations, (B) Authorizing Continuance of Workforce Programs, (C) Authorizing Payment of Withholding and Payroll-Related Taxes, (D) Authorizing Payment of Prepetition Claims Owning to Administrators, and Granting Related Relief; and (II) Final Hearing Thereon* [Docket No. 58] objections or responses to the final relief requested in the Motion were to be made in writing and filed with the Court on or before July 17, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”). The Debtors extended the Objection Deadline for the Official Committee of Unsecured Creditors (the “**Committee**”) to July 22, 2025 at 12:00 p.m.

4. Prior to the Objection Deadline, the Debtors received certain informal comments (the “**Comments**”) from (i) the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”), (ii) the Committee and (iii) the Chubb Companies (“**Chubb**”). Other than the Comments, the Debtors received no other informal responses to the Motion, and no objection or responsive pleading to the Motion has appeared on the Court’s docket in these chapter 11 cases.

5. The Debtors have revised the Proposed Final Order (the “**Revised Final Order**”) to resolve the Comments, and a copy of the Revised Final Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline comparison of the Revised Final Order marked against the Proposed Final Order is attached hereto as **Exhibit 2**.

6. The Revised Final Order has been circulated to counsel to the U.S. Trustee, the Committee, and Chubb, and the aforementioned parties do not object to the entry of the Revised Final Order.

WHEREFORE, the Debtors respectfully request that the Revised Final Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

[Signature page follows]

WHEREFORE, the Debtors respectfully request that the Further Revised Proposed Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: July 22, 2025
Wilmington, Delaware

/s/ Clint M. Carlisle

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Proposed Co-Counsel for Debtors and Debtors in Possession